

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

STATE OF GEORGIA,

v.

JEFFREY BOSSERT CLARK,

DEFENDANT.

Case No. 1:23-cv-3721

(Related to:

Case Nos.

1:23-cv-03621-SCJ

1:23-cv-03720-SCJ

1:23-cv-03792-SCJ

1:23-cv-03803-SCJ

Judge Steve C. Jones

On removal from the Fulton  
County Superior Court

**NOTICE OF FILING**

Comes now Jeffrey B. Clark, and gives notice of filing of the documents attached hereto, as follows:

1. Deposition of Jeffrey Rosen, Senate Judiciary Committee, Exh. 2  
Barr Memo on Election Investigations
2. Deposition of Jeffrey Rosen, Senate Judiciary Committee, Exh.12
3. Deposition of Richard Donoghue, Senate Judiciary Committee,  
Exh.18
4. Executive Order 13848 of September 12, 2018, on Imposing

Certain Sanctions in the Event of Foreign Interference in a United States Election

5. Report on Foreign Threats to the 2020 U.S. Federal Elections, available at <https://www.odni.gov/files/ODNI/documents/assessments/ICA-declass-16MAR21.pdf> (last visited Sep. 13, 2023).
6. Memo of the ODNI Director John Ratcliffe regarding Report on Foreign Threats to the 2020 U.S. Federal Elections, available at <https://www.washingtonpost.com/context/read-ratcliffe-s-letter-accusing-career-analysts-of-underplaying-chinese-influence-in-2020-election/bf1f635d-8bbb-4510-b01d-6b86d62bce14/> (last visited Sep. 13, 2023).
7. Report of the Independent IC Analytic Ombudsman's on Politicization of Intelligence, available at <https://www.washingtonpost.com/context/read-the-ombudsman-report-on-politicization-of-intelligence-on-foreign-election-threats/5f75b8c6-4ccb-4a09-982a-b8b027856bdf/>
8. About Cybersecurity and Infrastructure Security Agency and Election Security
9. Cybersecurity and Infrastructure Security Agency Statement on

Election Systems as Critical Infrastructure.

10. Cybersecurity Advisory: Iranian Advanced Persistent Threat Actor Identified Obtaining Voter Registration Data
11. Cybersecurity and Infrastructure Security Agency Advisory on Vulnerabilities Affecting Dominion Voting Systems ImageCast X
12. Risk Limiting Audits using ARLO Software funded by the Department of Homeland Security
13. About Federal Voter Assistance Program
14. About UOCAVA
15. About HAVA
16. About the Election Assistance Commission
17. Election Assistance Data Browser Information on Fulton County Absentee
18. Federal Voting Rights Constitutional and Statutory Provisions.
19. Executive Order 13891 of October 9, 2019, Promoting the Rule of Law Through Improved Agency Guidance Documents.
20. Executive Order 13892 of October 9, 2019 Promoting the Rule of Law Through Transparency and Fairness in Civil Administrative Enforcement and Adjudication
21. 52 U.S.C. § 20701.

Respectfully submitted, this 14 day of September, 2023.

**CALDWELL, CARLSON,  
ELLIOTT & DELOACH, LLP**

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Attorneys for Jeffrey B. Clark

**CERTIFICATE OF COMPLIANCE WITH L.R. 5.1**

The undersigned hereby certifies that this filing was prepared in the Times New Roman size 14 font in compliance with L.R. 5.1.

This this 14 day of September, 2023.

/s/ Harry W. MacDougald  
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## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing *Notice of Filing* was hereby filed on this 14 day of September, 2023 with the Court's electronic filing system which causes service to be made upon all counsel of record.

This 14 day of September, 2023.

/s/ Harry W. MacDougald  
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